

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF OREGON
PORTLAND DIVISION**

**NADIA ROBERTS,
an individual,**

PLAINTIFF,

v.

**RANDY L L CORPORATION,
a limited liability company,**

DEFENDANT.

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Case No. 3:24-CV-00523

**DECLARATION OF JUSTIN
BURLEY-BEAVERS**

I, Justin Burley-Beavers, declare under oath and under penalty of perjury, the following:

1. My name is Justin Burley-Beavers, and I am over the age of eighteen (18) years of age.
2. I am a resident of Portland, Oregon.
3. I retained Ms. Molligan to file suits to seek compliance with the ADA for businesses located in the area.
4. I agreed to give Ms. Molligan power of attorney to file and prosecute cases on my behalf.
5. At the onset of litigation, I agreed to give Ms. Molligan express authority to negotiate each case on my behalf to secure reasonable ADA related repairs to businesses in the area.
6. The only money I have received in connection with any accessibility cases is \$200.00 for my expenses associated with each case. My expenses include travel to/from the subject properties, purchases at the properties, travel to/from depositions, payment for Ubers to/from properties, and bus fare. This reimbursement has never been contingent on the outcome of any case, but rather the estimated expenses associated with each case that I actually incurred and expected to incur.
7. At the onset of litigation, I agreed that \$200.00 was a reasonable amount to reimburse me for expected expenses associated with each case.
8. I agreed that, as a regular patron and to preserve standing, I would revisit all properties that I sought to bring into compliance once the repairs were finished. This was carefully explained to me and discussed at the onset of litigation.
9. I am pleased with the work Ms. Molligan has done for me and other members of the disabled community in ensuring businesses comply with the ADA.
10. Without Ms. Molligan's efforts, businesses would continue to discriminate, without recourse, against me and other members of the disabled community by failing to provide adequate accommodations for access.

11. Despite the narrative produced by defense attorneys and members of the local media, I am proud of Ms. Molligan's and my efforts to hold businesses accountable to provide accessible facilities for all.

Dated this January 16, 2025

/s/ Justin Burley-Beavers
Justin Burley-Beavers

CERTIFICATE OF SERVICE

I have e-served and sent the foregoing Declaration to the following:

Theodore Roe
tedr@veritasbusinesslaw.com

Dated this January 16, 2025

/s/ Jessica Molligan
Jessica Molligan